

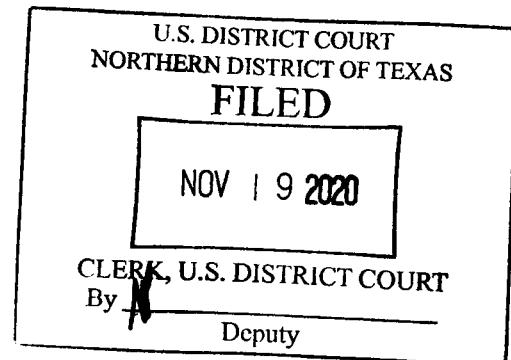
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA

v.

JESUS MANUEL GARCIA (1)
a/k/a "Don Chuy"
NOEL MANDUJANO (2)
a/k/a "Noe" or "Orejon"
ROBERT VERA (3)
OSVALDO CORTEZ (4)
a/k/a "Lito"
GUSTAVO RINCON (5)
a/k/a "Tavo"
RICKY DALE LEAVITT (6)
a/k/a "Big Rick"
TYLER MARTIN MILLER (7)
ROBERT FLORES (8)
a/k/a "Roberto"
TIFFANY DARLENE HANER (9)
MICHAEL DIAZ (10)
a/k/a "Mike"
RIGOBERTO CUEVAS (11)
a/k/a "Rigo"
JOHNNY ORTIZ (12)
a/k/a "Johnny O"
KRISTINA RENEE CHAPARRO (13)
a/k/a "Kristina Yebra"
MICHAEL REYES (14)
a/k/a "Rat"
JUAN ARTURO MARTINEZ (15)
STEVEN MENDEZ (16)
FRANK MARTINEZ (17)
a/k/a "Frankie"
JOHNNY GILBERT LOPEZ (18)
a/k/a "Cannon" or "Juan"
KATRINA CASAS (19)
RICARDO REYES, JR. (20)
a/k/a "Little Ricky"

No. 2:20-CR-015-Z
(Supersedes indictment filed 2/27/2020 only
as to: Noel Mandujano (2); Ricky Dale
Leavitt (6); Tyler Martin Miller (7); Robert
Flores (8); Frank Martinez (17);
Johnny Gilbert Lopez (18);
Cruz Nunez (22); Priscilla Kay
Caballero (27); and Leonardo
Ortuno-Palacio (34))



ROXANNE CASAS (21)
CRUZ NUNEZ (22)
a/k/a "Cruz Mendez"
CHRISTOPHER ALLEN SMITH (23)
a/k/a "Smitty"
JUAN MANUEL MARTINEZ (24)
a/k/a "Mitos"
MELENIE ARCEO (25)
LUIS ALBERTO GONZALEZ (26)
a/k/a "Tito"
PRISCILLA KAY CABALLERO (27)
SUSAN ODETTE STINNETT (28)
DENITA MIRELEZ (29)
a/k/a "Denita Mireles"
JOHN DAVID RAMIREZ (30)
CHRISTIAN DANIEL CORDOVA (31)
RICARDO CHAVEZ (32)
a/k/a "KK"
SERVIANO RIOJAS (33)
a/k/a "Smokey"
LEONARDO ORTUNO-PALACIOS (34)
a/k/a "Leo"

FIRST SUPERSEDING INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. § 846)

From on or about a date unknown to the grand jury and continuing through on or about the date of this indictment, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Jesus Manuel Garcia**, also known as "Don Chuy", **Noel Mandujano**, also known as "Noe" and "Orejon", **Robert Vera**, **Osvaldo Cortez**, also known as "Lito", **Gustavo Rincon**, also known as "Tavo", **Ricky Dale Leavitt**, also

known as “Big Rick”, **Tyler Martin Miller, Robert Flores**, also known as “Roberto”, **Tiffany Darlene Haner, Michael Diaz**, also known as “Mike”, **Rigoberto Cuevas**, also known as “Rigo”, **Johnny Ortiz**, also known as “Johnny O”, **Kristina Renee Chaparro**, also known as “Kristina Yebra”, **Michael Reyes**, also known as “Rat”, **Juan Arturo Martinez, Steven Mendez, Frank Martinez**, also known as “Frankie”, **Johnny Gilbert Lopez**, also known as “Cannon” and “Juan”, **Katrina Casas, Ricardo Reyes, Jr.**, also known as “Little Ricky”, **Roxanne Casas, Cruz Nunez**, also known as “Cruz Mendez”, **Christopher Allen Smith**, also known as “Smitty”, **Juan Manuel Martinez**, also known as “Mitos”, **Melenie Arceo, Luis Alberto Gonzales**, also known as “Tito”, **Priscilla Kay Caballero, Susan Odette Stinnett, Denita Mirelez**, also known as “Denita Mireles”, **John David Ramirez, Christian Daniel Cordova, Ricardo Chavez**, also known as “KK”, **Serviano Riojas**, also known as “Smokey”, and **Leonardo Ortuno-Palacios**, also known as “Leo”, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with persons known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

With respect to defendants **Jesus Manuel Garcia**, also known as “Don Chuy”, **Noel Mandujano**, also known as “Noe” and “Orejon”, **Robert Vera, Osvaldo Cortez, Jesus Manuel Garcia, et al.**
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also known as "Lito", **Gustavo Rincon**, also known as "Tavo", **Ricky Dale Leavitt**, also known as "Big Rick", **Tyler Martin Miller**, **Robert Flores**, also known as "Roberto", **Tiffany Darlene Haner**, **Michael Diaz**, also known as "Mike", **Rigoberto Cuevas**, also known as "Rigo", **Johnny Ortiz**, also known as "Johnny O", **Juan Arturo Martinez**, **Ricardo Reyes, Jr.**, also known as "Little Ricky", **Christopher Allen Smith**, also known as "Smitty", **Susan Odette Stinnett**, **Ricardo Chavez**, also known as "KK", and **Leonardo Ortuno-Palacios**, also known as "Leo", the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A)(viii).

With respect to defendants **Kristina Renee Chaparro**, also known as "Kristina Yebra", **Michael Reyes**, also known as "Rat", **Steven Mendez**, **Frank Martinez**, also known as "Frankie", **Johnny Gilbert Lopez**, also known as "Cannon" and "Juan", **Katrina Casas**, **Roxanne Casas**, **Cruz Nunez**, also known as "Cruz Mendez", **Juan Manuel Martinez**, also known as "Mitos", **Melenie Arceo**, **Luis Alberto Gonzales**, also known as "Tito", **Priscilla Kay Caballero**, **Denita Mirelez**, also known as "Denita Mireles", **John David Ramirez**, **Christian Daniel Cordova**, and **Serviano Riojas**, also known as "Smokey", the amount involved in the conspiracy attributable to them as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable

to them, is 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B)(viii).

All in violation of Title 21, United States Code, Section 846.

Count Two
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about December 11, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Jesus Manuel Garcia**, also known as “Don Chuy”, **Robert Vera**, and **Osvaldo Cortez**, also known as “Lito”, defendants, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Three
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about December 18, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Jesus Manuel Garcia**, also known as “Don Chuy”, and **Osvaldo Cortez**, also known as “Lito”, defendants, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Four
Distribution and Possession with Intent to Distribute
500 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about March 19, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Noel Mandujano**, also known as “Noe” and “Orejon”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Five
Distribution and Possession with Intent to Distribute
Five Grams or More of Methamphetamine (Actual)
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about April 12, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Robert Vera**, defendant, did intentionally and knowingly distribute and possess with intent to distribute five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Six
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about March 5, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Gustavo Rincon**, also known as “Tavo”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Seven
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine (Actual)
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about May 3, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Gustavo Rincon**, also known as “Tavo”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eight

Distribution and Possession with Intent to Distribute

50 Grams or More of Methamphetamine

(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about March 14, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Ricky Dale Leavitt**, also known as “Big Rick”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Nine

Convicted Felon in Possession of a Firearm
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about May 2, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Robert Flores**, also known as “Roberto”, defendant, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Walther, model P22, .22 caliber pistol, serial number obliterated.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

Count Ten
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about December 18, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Robert Flores**, also known as “Roberto”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eleven

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about December 18, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Robert Flores**, also known as “Roberto”, defendant, did knowingly possess a firearm, to wit: a pistol of an unknown make and model, in furtherance of a drug trafficking crime, that is, Distribution and Possession with Intent to Distribute 50 Grams or More of Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), as charged in count ten of this indictment, an offense for which the defendant may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twelve

Possession with Intent to Distribute 50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about May 2, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Tiffany Darlene Haner**, defendant, did intentionally and knowingly possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirteen

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about May 2, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Tiffany Darlene Haner**, defendant, did knowingly possess a firearm, to wit: a Smith and Wesson, model Bodyguard 380, .380 caliber pistol, serial number KBA6108, in furtherance of a drug trafficking crime, that is, Possession with Intent to Distribute 50 Grams or More of Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), as charged in count twelve of this indictment, an offense for which the defendant may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Fourteen
Convicted Felon in Possession of a Firearm
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about May 2, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Tiffany Darlene Haner**, defendant, knowing she had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Smith and Wesson, model Bodyguard 380, .380 caliber pistol, serial number KBA6108.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

Count Fifteen
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about April 4, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Michael Diaz**, also known as “Mike”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Sixteen
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about February 13, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rigoberto Cuevas**, also known as “Rigo”, and **Denita Mirelez**, also known as “Denita Mireles”, defendants, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Seventeen
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about February 21, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Rigoberto Cuevas**, also known as “Rigo”, and **Kristina Renee Chaparro**, also known as “Kristina Yebra”, defendants, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Eighteen
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about December 3, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Johnny Ortiz**, also known as “Johnny O”, **Kristina Renee Chaparro**, also known as “Kristina Yebra”, and **Melenie Arceo**, defendants, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Nineteen
Convicted Felon in Possession of a Firearm
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about May 2, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Johnny Ortiz**, also known as “Johnny O”, defendant, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Hi-Point, model C-9, 9mm pistol, serial number P1884518.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

Count Twenty
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about May 7, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Michael Reyes**, also known as “Rat”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-One
Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about March 30, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Juan Arturo Martinez**, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Two

Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about July 25, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Steven Mendez**, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Three

Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about July 18, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Frank Martinez**, also known as “Frankie”, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Four

Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 19, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Johnny Gilbert Lopez**, also known as “Cannon” and “Juan”, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Five

**Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))**

On or about May 20, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Katrina Casas**, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Six

Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about February 19, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Ricardo Reyes, Jr.**, also known as “Little Ricky”, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Seven
Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about April 6, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Roxanne Casas**, and **Susan Odette Stinnett**, defendants, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Eight
Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about July 18, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Cruz Nunez**, also known as “Cruz Mendez”, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Twenty-Nine

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about April 1, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Christopher Allen Smith**, also known as “Smitty”, defendant, did knowingly possess a firearm, to wit: a Springfield, model XDS, .45 caliber pistol, serial number XS649506, in furtherance of a drug trafficking crime, that is, Conspiracy to Distribute and Possess with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Section 846, as charged in count one of this indictment, an offense for which the defendant may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty
Convicted Felon in Possession of a Firearm
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about April 1, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Christopher Allen Smith**, also known as “Smitty”, defendant, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Springfield, model XDS, .45 caliber pistol, serial number XS649506.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

Count Thirty-One
Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about August 21, 2018, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Juan Manuel Martinez**, also known as “Mitos”, defendant, did intentionally and knowingly possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty-Two
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about January 14, 2020, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Melenie Arceo**, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty-Three
Convicted Felon in Possession of a Firearm
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about April 30, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Luis Alberto Gonzales**, also known as “Tito”, defendant, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Raven, model 25, .25 ACP pistol, serial number 1785519.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

Count Thirty-Four

Unlawful User of and Addict to a Controlled Substance in Possession of a Firearm
(Violation of 18 U.S.C. §§ 922(g)(3) and 924(a)(2))

On or about April 6, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Susan Odette Stinnett**, defendant, knowing that she was then an unlawful user of, and addicted to, a controlled substance as defined in 21 U.S.C. § 802, did knowingly possess in and affecting interstate and foreign commerce a firearm, to wit: a Ruger, model ec9s, 9mm pistol, serial number 455-75095.

In violation of Title 18, United States Code, Sections 922(g)(3), 924(a)(2), and 2.

Count Thirty-Five

Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about October 16, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **John David Ramirez**, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty-Six

Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about March 19, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Christian Daniel Cordova**, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty-Seven
Distribution and Possession with Intent to Distribute
50 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii))

On or about January 14, 2020, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Ricardo Chavez**, also known as “KK”, defendant, did intentionally and knowingly distribute and possess with intent to distribute 50 grams and more, but less than 500 grams, of a mixture and substance containing a detectable amount of methamphetamine, and five grams and more, but less than 50 grams, of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty-Eight

Distribution and Possession with Intent to Distribute Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(C))

On or about January 23, 2020, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Serviano Riojas**, also known as “Smokey”, defendant, did intentionally and knowingly distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Thirty-Nine

Possession with Intent to Distribute 500 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about March 5, 2020, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Noel Mandujano**, also known as “Noe” or “Orejon”, defendant, did intentionally and knowingly possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Forty

Possession of Firearms in Furtherance of a Drug Trafficking Crime
(Violation of 18 U.S.C. § 924(c))

On or about March 5, 2020, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Noel Mandujano**, also known as “Noe” or “Orejon”, defendant, did knowingly possess firearms, to wit:

- a. a Phoenix Arms, model HP 22, .22 caliber firearm, serial number 4254383;
- b. a Mossberg, model 100ATR, .243 caliber firearm, serial number BA129043;
- c. a Winchester, model 1300, 12 gauge shotgun, serial number L3177447;
- d. a Marlin Firearms, model 60, .22 caliber firearm, serial number 1190480;
- e. a NEF, model R92, .22 caliber firearm, serial number NF015547;
- f. a Winchester, model 94, 30 WCF caliber firearm, serial number 1230320;
- g. a Savage, model 110, .270 caliber firearm, serial number F093334;
- h. an Archangel, model .22 LR, .22 caliber firearm, serial number 232-38823; and
- i. a Glenfield, model 60, .22 caliber firearm, serial number 21S74209

in furtherance of a drug trafficking crime, that is, Distribution and Possession with Intent to Distribute 50 Grams or More of Methamphetamine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii), as charged in count ten of this indictment, an offense for which the defendant may be prosecuted in a court of the United States.

In violation of Title 18, United States Code, Sections 924(c) and 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Count Forty-One
Convicted Felon in Possession of Firearms
(Violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

On or about March 5, 2020, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Ricky Dale Leavitt**, also known as “Big Rick”, defendant, knowing he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting interstate and foreign commerce firearms, to wit:

- a. a Lorcin, model L380, .380 caliber firearm, serial number 129133;
- b. a HiPoint, model HP25A, .25 caliber firearm, serial number 4471020;
- c. a Mossberg, model 500E, .410 gauge shotgun, serial number J999887;
- d. a Remington, model 870 Express, 12 gauge shotgun, serial number W804114M;
- e. a Winchester, model 50, 12 gauge shotgun, serial number 167750A;
- f. a Mossberg, model 500, 12 gauge shotgun, serial number T919321;
- g. a Ruger-Sturm, model unknown, 20 gauge shotgun, serial number 400-02772; and
- h. an Olympic, model MFR, .556 caliber firearm, CH2928.

In violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.

Count Forty-Two
Unlawful Use of a Communications Facility
(Violation of 21 U.S.C. § 843(b))

On or about February 16, 2019, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Priscilla Kay Caballero**, defendant, did intentionally and knowingly use a communications facility, to wit: a cellular telephone, with the intent to commit, facilitate the commission of, and cause the commission of the felony offense of Distribution and Possession with Intent to Distribute Methamphetamine, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(b).

Count Forty-Three

Possession with Intent to Distribute 500 Grams or More of Methamphetamine
(Violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii))

On or about March 5, 2020, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Leonardo Ortuno-Palacios**, also known as “Leo”, defendant, did intentionally and knowingly possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, and 50 grams and more of methamphetamine (actual), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A)(viii), Title 18, United States Code, Section 2, and *Pinkerton v. United States*, 328 U.S. 640 (1946).

Forfeiture Notice
(18 U.S.C. § 924(d) and 21 U.S.C. § 853(a))

Upon conviction of any of the offenses alleged in this indictment, and pursuant to 18 U.S.C. § 924(d) and 21 U.S.C. § 853(a), **Jesus Manuel Garcia**, also known as “Don Chuy”, **Noel Mandujano**, also known as “Noe” and “Orejon”, **Robert Vera, Osvaldo Cortez**, also known as “Lito”, **Gustavo Rincon**, also known as “Tavo”, **Ricky Dale Leavitt**, also known as “Big Rick”, **Tyler Martin Miller**, **Robert Flores**, also known as “Roberto”, **Tiffany Darlene Haner**, **Michael Diaz**, also known as “Mike”, **Rigoberto Cuevas**, also known as “Rigo”, **Johnny Ortiz**, also known as “Johnny O”, **Kristina Renee Chaparro**, also known as “Kristina Yebra”, **Michael Reyes**, also known as “Rat”, **Arturo Martinez**, also known as “Juan”, **Steven Mendez**, **Frank Martinez**, also known as “Frankie”, **Johnny Gilbert Lopez**, also known as “Cannon” and “Juan”, **Katrina Casas**, **Ricardo Reyes, Jr.**, also known as “Little Ricky”, **Roxanne Casas**, **Cruz Nunez**, also known as “Cruz Mendez”, **Christopher Allen Smith**, also known as “Smitty”, **Juan Manuel Martinez**, also known as “Mitos”, **Melenie Arceo**, **Luis Alberto Gonzales**, also known as “Tito”, **Priscilla Kay Caballero**, **Susan Odette Stinnett**, **Denita Mirelez**, also known as “Denita Mireles”, **John David Ramirez**, **Christian Daniel Cordova**, **Ricardo Chavez**, also known as “KK”, **Serviano Riojas**, also known as “Smokey”, and **Leonardo Ortuno-Palacios**, also known as “Leo”, defendants, shall forfeit to the United States of America any firearm involved in or used in the knowing commission of the offense, or any property constituting, or derived from, any proceeds the defendants

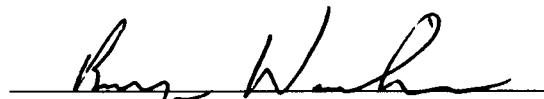
obtained, directly or indirectly, as a result of the commission of the above offenses, including, but not limited to, the following:

- a. a Walther, model P22, .22 caliber pistol, serial number obliterated;
- b. a Smith and Wesson, model Bodyguard 380, .380 caliber pistol, serial number KBA6108;
- c. a Hi-Point, model C-9, 9mm pistol, serial number P1884518;
- d. a Springfield, model XDS, .45 caliber pistol, serial number XS649506;
- e. a Raven, model 25, .25 ACP pistol, serial number 1785519;
- f. a Ruger, model ec9s, 9mm pistol, serial number 455-75095;
- g. a Phoenix Arms, model HP 22, .22 caliber firearm, serial number 4254383;
- h. a Mossberg, model 100ATR, .243 caliber firearm, serial number BA129043;
- i. a Winchester, model 1300, 12 gauge shotgun, serial number L3177447;
- j. a Marlin Firearms, model 60, .22 caliber firearm, serial number 1190480;
- k. a NEF, model R92, .22 caliber firearm, serial number NF015547;
- l. a Winchester, model 94, 30 WCF caliber firearm, serial number 1230320;
- m. a Savage, model 110, .270 caliber firearm, serial number F093334;
- n. an Archangel, model .22 LR, .22 caliber firearm, serial number 232-38823;
- o. a Glenfield, model 60, .22 caliber firearm, serial number 21S74209;
- p. an LG, model LGL34C cellular phone, serial number 407CQMR0408643;
- q. a Verizon, model CD1X8975PTT cellular phone, serial number 8510047356;
- r. a HTC, model 4G LTE cellular phone, serial number FASCNSX01992;
- s. an Apple, model iPhone 8 cellular phone, serial number FFMC1951JC67;
- t. a Kyocera, model S2702DP cellular phone, serial number 015247000225656;
- u. a Samsung, model SCH4660 cellular phone, serial number A0000039674F94;
- v. an LG, model LG-VN220 cellular phone, serial number 711CQPY0069784;
- w. a black Motorola cellular phone, model and serial number unknown, seized by the FBI on March 5, 2020, from the residence located at 3220 FM 2943, Hereford, Texas, 79045;
- x. a total of \$12,705.00 in United States currency, seized by the FBI on March 5, 2020, from the residence located at 3220 FM 2943, Hereford, Texas, 79045;
- y. a Lorcin, model L380, .380 caliber firearm, serial number 129133;

z. a HiPoint, model HP25A, .25 caliber firearm, serial number 4471020;
aa. a Mossberg, model 500E, .410 gauge shotgun, serial number J999887;
bb. a Remington, model 870 Express, 12 gauge shotgun, serial number
W804114M;
cc. a Winchester, model 50, 12 gauge shotgun, serial number 167750A;
dd. a Mossberg, model 500, 12 gauge shotgun, serial number T919321;
ee. a Ruger-Sturm, model unknown, 20 gauge shotgun, serial number 400-
02772;
ff. an Olympic, model MFR, .556 caliber firearm, CH2928;
gg. a Colt, model 22 Short, .22 caliber firearm, serial number 54511D;
hh. a Walther, model P22, .22 caliber pistol, serial number obliterated;
ii. a black Samsung, model SCH-U320 cellular phone, serial number
A00000247ED7CB;

including any additional ammunition, magazines, and/or accessories recovered with the firearms.

A TRUE BILL:



FOREPERSON

ERIN NEALY COX
UNITED STATES ATTORNEY



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Assistant United States Attorney
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA

v.

JESUS MANUEL GARCIA (1)
a/k/a "Don Chuy"
NOEL MANDUJANO (2)
a/k/a "Noe" or "Orejon"
ROBERT VERA (3)
OSVALDO CORTEZ (4)
a/k/a "Lito"
GUSTAVO RINCON (5)
a/k/a "Tavo"
RICKY DALE LEAVITT (6)
a/k/a "Big Rick"
TYLER MARTIN MILLER (7)
ROBERT FLORES (8)
a/k/a "Roberto"
TIFFANY DARLENE HANER (9)
MICHAEL DIAZ (10)
a/k/a "Mike"
RIGOBERTO CUEVAS (11)
a/k/a "Rigo"
JOHNNY ORTIZ (12)
a/k/a "Johnny O"
KRISTINA RENEE CHAPARRO (13)
a/k/a "Kristina Yebra"
MICHAEL REYES (14)
a/k/a "Rat"
JUAN ARTURO MARTINEZ (15)
STEVEN MENDEZ (16)
FRANK MARTINEZ (17)
a/k/a "Frankie"
JOHNNY GILBERT LOPEZ (18)

a/k/a "Cannon" or "Juan"
KATRINA CASAS (19)
RICARDO REYES, JR. (20)
a/k/a "Little Ricky"
ROXANNE CASAS (21)
CRUZ NUNEZ (22)
a/k/a "Cruz Mendez"
CHRISTOPHER ALLEN SMITH (23)
a/k/a "Smitty"
JUAN MANUEL MARTINEZ (24)
a/k/a "Mitos"
MELENIE ARCEO (25)
LUIS ALBERTO GONZALEZ (26)
a/k/a "Tito"
PRISCILLA KAY CABALLERO (27)
SUSAN ODETTE STINNETT (28)
DENITA MIRELEZ (29)
a/k/a "Denita Mireles"
JOHN DAVID RAMIREZ (30)
CHRISTIAN DANIEL CORDOVA (31)
RICARDO CHAVEZ (32)
a/k/a "KK"
SERVIANO RIOJAS (33)
a/k/a "Smokey"
LEONARDO ORTUNO-PALACIOS (34)
a/k/a "Leo"

COUNT 1: CONSPIRACY TO DISTRIBUTE AND POSSESS
WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
Title 21, United States Code, Section 846.

COUNTS 2, 3, 6, 8, 10
15-18, 20, 32, 37: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE 50 GRAMS OR MORE OF
METHAMPHETAMINE
Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(B)(viii).

COUNT 4: DISTRIBUTION AND POSSESSION WITH INTENT TO
DISTRIBUTE 500 GRAMS OR MORE OF
METHAMPHETAMINE
Title 21, United States Code, Sections 841(a)(1) and
841(b)(1)(A)(viii).

COUNT 5: DISTRIBUTION AND POSSESSION WITH INTENT TO DISTRIBUTE FIVE GRAMS OR MORE OF METHAMPHETAMINE (ACTUAL)
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNT 7: DISTRIBUTION AND POSSESSION WITH INTENT TO DISTRIBUTE 50 GRAMS OR MORE OF METHAMPHETAMINE (ACTUAL)
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNTS 9, 14, 19, 30, 33, 41: CONVICTED FELON IN POSSESSION OF A FIREARM(S)
Title 18, United States Code, Section 922(g)(1).

COUNTS 11, 13, 29, 40: POSSESSION OF A FIREARM(S) IN FURTHERANCE OF A DRUG TRAFFICKING CRIME
Title 18, United States Code, Section 924(c).

COUNT 12: POSSESSION WITH INTENT TO DISTRIBUTE 50 GRAMS OR MORE OF METHAMPHETAMINE
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(viii).

COUNTS 21-26, 28, 35-36, 38: DISTRIBUTION AND POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNTS 27, 31: POSSESSION WITH INTENT TO DISTRIBUTE METHAMPHETAMINE
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 34: UNLAWFUL USER OF AND ADDICT TO A CONTROLLED SUBSTANCE IN POSSESSION OF A FIREARM
Title 18, United States Code, Section 922(g)(3).

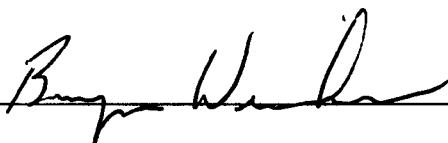
COUNTS 39, 43: POSSESSION WITH INTENT TO DISTRIBUTE 500 GRAMS OR MORE OF METHAMPHETAMINE
Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

COUNT 42: UNLAWFUL USE OF A COMMUNICATIONS FACILITY
Title 21, United States Code, Section 843(b).

(43 COUNTS + FORFEITURE NOTICE)

A true bill rendered:

Amarillo



Foreperson

Filed in open court this 19th day of November, A.D. 2020.

Arrest warrants to issue as to: Frank Martinez (17) and Leonardo Ortuno-Palacios (34).

All other defendants currently apprehended.



Lee Ann Reno
UNITED STATES MAGISTRATE JUDGE